

EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)
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This document relates to:

Alexander Jimenez, et al. v. Islamic Republic of Iran, 1:18-cv-11875 (GBD) (SN)

DECLARATION OF FAMILIAL RELATIONSHIP

I, Jem Howard, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is Jem Howard, and I am the step-son of Alan LaFrance, who died on September 11, 2001 when the World Trade Center collapsed. I submit this Declaration for the purpose of demonstrating that Alan LaFrance was the functional equivalent of my father.

2. While not Alan LaFrance's biological son, for the reasons set forth below, I should be deemed the functional equivalent.

3. Alan LaFrance came into my life in 1980 when he started dating my mother. I was 10 at the time.

4. One year later, on September 27, 1980, he and my mother were married and, along with my brother Jody, we became a family. *See* Exhibit 1.

5. I never knew my biological father growing up. He left my mom when I was 4 years old, although I did meet him once briefly in 2005 when I was 35. He tried to talk to me like he was my father, giving me advice, and I told him "my father died in 9/11." I did not see him after that.

6. Alan (who I only ever referred to as “Dad”) was the only true father I have ever known.

7. Dad worked hard to provide for my mother, me, and my brother. Among other jobs, he worked as an audio/visual specialist at Windows of the World in the World Trade Center. *See* Exhibit 2.

8. He was a whiz at electronics, and I always loved watching him work on projects in our living room.

9. When he wasn’t working, my dad also loved playing the drums; he was very skilled.

10. In addition to this financial support, he treated me like his son, emotionally and socially. He would give me advice (and, of course, discipline) like any loving father and as to the outside world, there was no question that “I was his son.”

11. His whole side of the family treated me that way. I was a “nephew” to his brothers and a “grandson” to his parents.

12. My dad would take my brother and me to the movies in Manhattan and the Bronx and we would always take short trips to places like six flags, Amish country and along with other family members to Maine. We loved it.

13. We lived in the same household for 11 years and I moved out when 21, although I still kept in touch with my parents through regular telephone calls and visits to the house. I still lived in the Bronx and was able to visit frequently.

14. In fact, after I moved out, Dad and I actually became closer. It was only then that I realized what a blessing it was that he was so strict with me growing up. I never understood it as a child, but when I was grown and had two daughters of my own, only then could I really

appreciate how much he cared. His discipline made sure I lived my life the right way, never joining a gang nor having issues with the law.

15. He was also an excellent grandfather to my children. He and my mom would always come over to the house to visit them throughout the year as well as take them on vacations in the summertime.

16. And when the mother of my children and I were sharing custody, dad and mom would always help me by picking up and dropping them off if I was stuck at work.

17. I generally worked nights, including at the time of the September 11th attacks.

18. Therefore, when it happened, I was at home watching it unfold on live television.

19. At first I just felt so bad for the people in those buildings; I had to turn the TV off when they started showing people jump from the buildings. But I wasn't worried about my dad, because he worked nights like me.

20. But then my brother called me and told me dad was at work at the time, because he was covering a shift for someone else.

21. I didn't believe him, so I called my mom and she said, yes he was, but everything was going to be alright.

22. I went to the house immediately.

23. My mom had her friends and my brother there as well as me supporting her.

24. I tried to keep a brave face for my mom's sake, but could only keep it up so long as I was devastated.

25. I was an emotional wreck and didn't want my mom to see me like that, so I kept my work schedule.

26. Going into work allowed me to focus on other things because, otherwise, all I could think about was how I would never see my dad again.

27. Unfortunately, the whole family eventually realized he had been lost in the attacks; we never located his remains.

28. The family gathered together (including the extended family on my Dad's side) because we had to make a decision about what to do when his body was not located.

29. We decided to hold a memorial service on Sept 29th, two days after my parents' anniversary where she was going to give him a new wedding ring (he had lost his).

30. In dad's obituary, I was listed as his son. *See* Ex. 3.

31. To this day, I cannot go south of Canal Street. I will always use an alternate route so I do not have to travel through the financial district.

32. On the upcoming anniversary of 9/11 I am going to try for the first time to visit the 9/11 memorial with my girlfriend there as support. It's just been too hard to do.

33. In sum, Alan LaFrance was my Dad and we considered each-other to be father and son in every way.

34. He was in my life for 21 of my 31 years on this earth and will always miss him dearly.

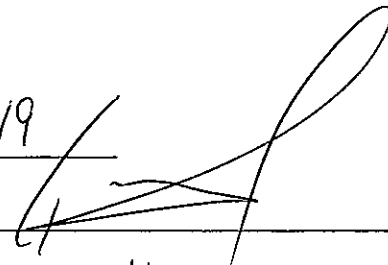
Executed on: 8/13/19
Name (Signature): 
Name (Print): Jen Hawner

EXHIBIT 1













EXHIBIT 2



ALAN LAFRANCE

WINDOWS ON THE WORLD BLD. #1 FLOOR 106

EXHIBIT 3

*In Loving Memory
of
Alan Charles LaFrance*



July 1958 - September 2001

Memorial Service
Saturday, 29 September 2001
1.30 p.m.
Kingdom Hall of Jehovah's Witnesses
3025 Ely Avenue, Bronx, New York

OBITUARY

Alan Charles LaFrance was a wonderful family man who grew up in the Bronx, New York. He loved talking with others about the Good News of God's Kingdom in which peace will abound, righteousness will dwell and there will be no more sickness, pain and death.

Alan was an Audio/Visual Technician by Trade and worked at such places as the Rainbow Room, Schomburg Center and Windows on the World. His Ministry, trade and enjoyment from playing the drums, introduced him to many famous and interesting people - this to his pleasure and undoubtedly theirs.

Alan is survived by his wife Edlene, sons Jem and Jody, his father Aubrey, mother Madelyn, his brothers and sisters, Jerry, Ann-Marie, Carolyn, Yvonne, Steven, Sean, Corey, Andre, grandchildren, Giovanni, Ashanti, Jeneice and many friends worldwide.

We know for him its just the blink of an eye until he sees us again, but for us who acknowledge the passage of time, he will be sorely missed until we see him again.

Lovingly Submitted - The Family

Order of Service

Opening Prayer

DiscourseJames Jones

Song #185“Life Everlasting Is Promised”

Obituary.....James Jones

Song # 15.....“Life Without End At Last”

Closing Prayer

“And He will wipe out every tear from their eyes
and death will be no more, neither will mourning
nor outcry nor pain be any more.
The former things have passed away.”
Revelation 21: 3,4

“Do not marvel at this, because the hour is coming in
which all those in the memorial tombs will hear
his voice and come out. . .”
John 5:28,29a